## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MICHAEL FREEDMAN, Individually and on : Civil Action No. 1:14-cv-09357-WHP

Behalf of All Others Similarly Situated,

Plaintiff,

V.

MOL GLOBAL, INC., GANESH KUMAR BANGAH, ALLAN SAI WAH WONG, CRAIG WHITE, YIT FEI CHANG, TEK KUANG CHEAH, MUN KEE CHANG, ERIC HE, NOAH J. DOYLE, CITIGROUP GLOBAL MARKETS INC, DEUTSCHE BANK SECURITIES INC., UBS SECURITIES LLC, and CIMB SECURITIES (SINGAPORE) PTE LTD.,

Defendants.

WAYNE JEWELL, Individually and on Behalf: of All Others Similarly Situated,

Plaintiff,

V.

MOL GLOBAL, INC., TAN SRI DATO' SERI VINCENT TAN, GANESH KUMAR BANGAH, ALLAN SAI WAH WONG, CRAIG WHITE, YIT FEI CHANG, ERIC HE, NOAH J. DOYLE, CITIGROUP GLOBAL MARKETS INC., DEUTSCHE BANK SECURITIES INC., UBS SECURITIES LLC, and CIMB SECURITIES (SINGAPORE) PTE LTD.,

Defendants.

 MOVANT ACG GROUP LLC'S NOTICE OF MOTION AND MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF **SELECTION OF COUNSEL** 

Civil Action No. 1:14-cv-09403-WHP

PLEASE TAKE NOTICE that, on a date and at a time designated by the Court, in the courtroom of the Honorable William H. Pauley III, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Movant ACG Group LLC ("ACG Group") will respectfully move the Court, pursuant to section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, for entry of an Order: (i) consolidating the related actions pursuant to Federal Rule of Civil Procedure 42(a); (ii) appointing the ACG Group as Lead Plaintiff in the above-captioned actions; and (iii) approving its selection of Robbins Arroyo LLP as Lead Counsel and the Law Offices of Thomas G. Amon as Liaison Counsel for the class.

The grounds for this Motion are set forth in the Memorandum of Law in Support of Movant ACG Group's Motion for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Counsel; and the Declaration of Thomas G. Amon in Support of Movant ACG Group's Motion for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Counsel, filed contemporaneously herewith.

Dated: January 23, 2015 LAW OFFICES OF THOMAS G. AMON

/s/Thomas G. Amon

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[Proposed] Lead Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Court's electronic mail notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 23, 2015.

